

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MARGARET CRAIG, as next of
kin and personal
representative of the estate
of Angela Hulsey,

Plaintiff,

vs.

CHEATHAM COUNTY, TENNESSEE,
BEN MOORE, MARK BRYANT,
STEPHANIE GIZZI-BELL, JESSICA
PLANK, et al.,

Defendants.

No. 3:17-cv-01335
JURY DEMAND
JUDGE CAMPBELL
MAGISTRATE HOLMES

The Deposition of
MARK MITCHELL BRYANT
January 14, 2019

Penny Townsend Morrison, RMR, LCR, CCR
Accurate Court Reporting
The Pilcher Building
P.O. Box 682683
Franklin, TN 37068
(615) 244-DEPO or 244-3376
www.ACR-Nashville.com

COPY

1 me. I just know when I got there she was laying on her
2 bunk.

3 I believe I asked her if she was okay. She
4 was talking to me. I think I helped her up from her
5 bunk. She said she was in pain, felt weak. I escorted
6 her to booking and sat her in a chair and took some
7 vitals.

8 Q. All right. Do you recall what those vitals
9 were?

10 A. They were within normal.

11 Q. Did you log those in any form? Do you know?

12 A. Not that I recall.

13 Q. Did you call the nurse?

14 A. Yes, sir.

15 Q. What did you tell the nurse?

16 A. That Ms. Hulsey was complaining of some pain.
17 She wasn't feeling right.

18 Q. Anything else?

19 A. No, not really. Not that I remember. I just
20 know that she just didn't feel good. My assumption was
21 detox symptoms.

22 Q. Did you communicate that assumption?

23 A. Well, I mean, I think it was already something
24 that the nurse was aware of.

25 Q. How do you know that?

1 A. Well, I don't honestly, but...

2 Q. So do you know whether or not you personally
3 communicated to Nurse Plank that you suspected drug
4 detox or withdrawal?

5 A. No, not during that phone call. No.

6 Q. Do you recall whether or not you communicated
7 the vitals?

8 A. Yes, of course. That would be the whole
9 reason for the phone call.

10 Q. Okay. And you would have given the actual
11 values, the numerical values?

12 A. Yes.

13 Q. Okay. You don't recall what those were?

14 A. No, sir.

15 Q. And you didn't log them?

16 A. No, sir.

17 Q. Do you recall telling the nurse that
18 Ms. Hulsey was panicking?

19 A. I believe so.

20 Q. Okay. And what do you mean by "panicking"?

21 A. She was just -- it just seemed like she didn't
22 want to be in the back anymore, so it kind of seemed
23 like a way for her to get out of there, was to ask for
24 some medical attention.

25 Q. All right. Did you ever tell the nurse that

1 Ms. Hulsey had suffered a seizure?

2 A. I didn't see Ms. Hulsey have a seizure.

3 Q. Were you ever told by anybody that Ms. Hulsey
4 had a seizure?

5 A. Not that I recall.

6 Q. If you had been told that she had suffered a
7 seizure, what would your response have been?

8 A. I would have passed that information along.

9 Q. Do you recall what the nurse told you?

10 A. Since she had -- Ms. Hulsey was complaining of
11 some pain, I think we gave her some ibuprofen or
12 acetaminophen. I don't remember which one.

13 Q. Do you know what kind of pain she was
14 describing?

15 A. Everywhere. She just said she hurt from her
16 head to her toes, I'm sure.

17 Q. All right. Not specifically a headache?

18 A. No.

19 Q. Okay. I understand from the records that she
20 was placed on a headache protocol in terms of medical --

21 A. Okay.

22 Q. -- response.

23 Do you recall telling Nurse Plank that she had
24 a headache?

25 A. No, I don't recall that, but I may have.

1 Q. Okay. Would you have told Nurse Plank that
2 she was hurting everywhere?

3 A. Maybe. I probably would have just said that
4 she was complaining of pain.

5 Q. So you were directed by the nurse to
6 administer Tylenol?

7 A. Or ibuprofen. I don't recall.

8 Q. And I take it at this point, that's an
9 over-the-counter strength?

10 A. Yes, sir.

11 Q. Okay. Did you personally take her from the
12 dorm to medical observation?

13 A. I don't know if I actually put her in cell,
14 but I took her from the dorm to booking where we did the
15 vitals.

16 Q. Okay. What, if any, other interaction did you
17 have with Ms. Hulsey after that?

18 A. I don't remember having any further
19 interaction.

20 Q. Were you ever informed or told about
21 Ms. Hulsey's condition after that day?

22 A. I understood that she went to the hospital.

23 Q. Okay. And that was the next day, on the 12th?

24 A. I'm not sure if it was the next day. I don't
25 know what days of the week it was. I might have been

1 off.

2 Q. Okay. This happened on the 11th. She was
3 taken the next day, on the 12th. So you don't recall
4 when it was that you were informed that she had been
5 taken to the hospital?

6 A. No, I don't.

7 Q. Okay. So whenever that was, it was sometime
8 after -- or the next time you came on shift?

9 A. Correct.

10 Q. Okay. And you work second shift, I think?

11 A. Correct.

12 Q. Were you the supervisor of that shift?

13 A. I was corporal, which was shift supervisor on
14 Fridays and Saturdays.

15 Q. All right. Help me understand what that
16 means.

17 A. That means my sergeant was not there on Friday
18 and Saturday, so I took over.

19 Q. Okay.

20 A. Those were his regular days off.

21 Q. All right. So the 11th looks to be a Tuesday.

22 A. Okay.

23 Q. Do you know if -- well, you testified that
24 you're the one that called the nurse?

25 A. Uh-huh.

1 anything that happened on my shift that I recall for
2 certain, but I do remember hearing about it.

3 Q. All right. Do you know if that was also
4 information you conveyed to the nurse during that phone
5 call?

6 A. It hadn't happened at that point in time.

7 Q. Do you recall making any observations of
8 Ms. Hulsey while she was in med watch?

9 A. I'm sure I did, but I don't remember anything
10 specific.

11 Q. Do you recall if Jeff Key was on shift with
12 you at that time?

13 A. I believe so.

14 Q. Okay. Do you know why he noted that
15 Ms. Hulsey was crying at about 9:50 p.m. on the 11th?

16 A. I'm not sure.

17 Q. What, if anything, did Ms. Hulsey tell you
18 about her condition?

19 A. I don't really think she told me anything
20 other than she was just in pain.

21 Q. Do you recall her having her tongue out --

22 A. No.

23 Q. -- and having difficulty talking with her
24 tongue out?

25 A. No.

1 Q. Do you recall her being weak at all?

2 A. She said she was feeling weak, and that's why
3 I helped her up off her bunk. It's down on the floor.
4 So just to prevent any further injury if she got up and
5 felt light-headed, and then she goes down, then we are
6 compounding the situation.

7 Q. And is that -- the bed that she was staying
8 in, is that also referred to as a "boat"?

9 A. Yes, sir.

10 Q. What's the reason she was in a boat as opposed
11 to a normal bunk?

12 A. Overcrowded.

13 Q. Do you know how overcrowded it was?

14 A. I want to say we had 120, 130 beds, and
15 probably 150 to 180 inmates at any given time.

16 Q. Do you know if she was sweating at the time?

17 A. I don't recall.

18 Q. Do you recall her having any trouble
19 breathing?

20 A. No, sir.

21 Q. Do you recall her telling you she felt like
22 she was dying?

23 A. No, sir.

24 Q. So I'm clear, you never specifically told
25 Nurse Plank that you believed Ms. Hulsey was withdrawing

1 questions.

2 MS. KELLY: No questions.

3 MR. DEDMAN: I have some.

4 EXAMINATION

5 BY MR. DEDMAN:

6 Q. I'm Marc Dedman, and I represent Ms. Plank. I
7 have some questions I want to follow up with. I think
8 it's going to be fairly short.

9 I'm going to say to you what I'm understanding
10 you to have said. If I say something incorrect, it's
11 inadvertent, I promise you that. You correct me. Will
12 you do that, just to make sure I'm right?

13 A. Sure.

14 Q. If I understood your testimony with respect to
15 the condition of Ms. Hulsey, the contact that you had
16 with Nurse Plank discussing Ms. Hulsey was one time?

17 A. Yes.

18 Q. When you had that contact with Nurse Plank,
19 was it via face-to-face? Via intercom?

20 A. My cell phone to her cell phone.

21 Q. When you had that discussion with her, did you
22 tell her what you observed?

23 A. Sure.

24 Q. Did she listen?

25 A. I'm sure.